



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 15, 2020

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Joseph Guagliardo,*  
20 Cr. 23 (DLC)**

Dear Judge Cote:

The Government respectfully writes in the above-captioned matter regarding the Court's request for a submission on any additional restitution sought on behalf of the victim, Municipal Credit Union ("MCU"), due on Friday, September 18, 2020. The Government and defense counsel have been in discussions regarding additional restitution and anticipate that an agreed-upon resolution will be reached directly between MCU and the defendant, thus mooted the need for a court order. However, the Government understands that a resolution is not likely to be reached this week, because the defendant is currently in quarantine at his designated facility and therefore is not able to communicate easily with his counsel. Accordingly, the Government and defense counsel jointly request that the Court adjourn the deadline for the restitution submission to October 19, 2020, to permit time to complete negotiations between the defendant and MCU.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: s/ Eli J. Mark/Daniel C. Richenthal  
Eli J. Mark  
Daniel C. Richenthal  
Assistant United States Attorneys  
(212) 637-2431/2109  
Alona Katz  
Special Assistant United States Attorney

cc: (by ECF)  
John Arlia, Esq.